

## LINCOLN CITY/LANCASTER COUNTY PLANNING STAFF REPORT

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for November 9, 2005 PLANNING COMMISSION MEETING

**P.A.S.:** Special Permit 1583B  
Russ' Market

**PROPOSAL:** Allow a parking lot within a residential zoning district to serve existing grocery store.

**LOCATION:** South 17<sup>th</sup> and Garfield Streets.

**LAND AREA:** Entire site is 93,262 sq. ft., more or less.  
New parking area is 6,765 sq. ft., more or less.

**CONCLUSION:** The Comprehensive Plan specifies that commercial use intrusions into residential areas should not be allowed. The Zoning Ordinance, however, does allow certain expansions of commercial uses and parking lots into residential areas by special permit. The expansion of parking over this lot provides a more efficient parking layout, and is represented by Applicant as the final stage in their development.

<b><u>RECOMMENDATION:</u></b>	Conditional Approval
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### **GENERAL INFORMATION:**

**LEGAL DESCRIPTION:** Lot 8, W. W. Holmes Subdivision of Lot 11, located in the NW 1/4 of Section 36 T10N R6E, Lancaster County, Nebraska

**EXISTING LAND USE AND ZONING:** Vacant R-6 Residential

### **SURROUNDING LAND USE AND ZONING:**

North:	Parking lot for grocery store	R-6 Residential
South:	Single-, Two-, and Multiple-family dwellings	R-6 Residential
East:	Single-family dwelling	R-6 Residential
West:	Parking lot for grocery store	R-6 Residential

### **HISTORY:**

Mar 2004 Special Permit #1583A requested a parking lot over this same parcel. Planning staff recommended denial, Planning Commission recommended denial 5-3, and a motion to approve by the City Council lost 3-4.

Jun 1997 Administrative Amendment #97054 to Special Permit #1583 approved a seasonal fireworks tent located within the parking lot.

- Nov 1995 Special Permit #1583 approved a parking lot located on Lots A, E, 9, and 10, which are zoned residential, to serve the adjacent grocery store. Planning staff recommended denial.
- Mar 1986 Special Permit #1052B approved the reconfiguration of the parking lot in conjunction with the expansion of the adjacent grocery store. This permit covers the area of Special Permit #640 and those portions of #1052 and #1052A that were still zoned R-6. Planning staff recommended conditional approval.
- Nov 1985 Change of Zone #2207 approved changing the zoning on nearby property from R-6 Residential to B-3 Commercial for an 11' wide strip to accommodate a canopy over a newly remodeled grocery store entrance. This re-zoned portions of Special Permits #1052 and #1052A to B-3.
- Oct 1984 Special Permit #1052A approved the use of the east half of Lot 6, which was zoned residential, as an off-street parking lot for the adjacent grocery store. Planning staff recommended conditional approval.
- Jul 1983 Special Permit #1052 approved the use of a part of that portion of Lot 6 zoned residential as off-street parking, with 0' front yard setback, for the adjacent grocery store. Planning staff recommended denial due to adverse impact on nearby residential uses.
- May 1979 The zoning update changed the designation of this property from D Multiple Dwelling to R-6 Residential.
- Oct 1975 Special Permits #640 and #640 reinstated by City Council. Applicant brought property into compliance with special permit conditions.
- Oct 1975 Special Permits #640 and #640A revoked by City Council due to non-compliance with conditions of special permit.
- Aug 1975 Special Permit #220 revoked. Since its issuance, part of Lot 2 had been rezoned to a district that allowed parking, and Special Permit #640 had been issued over the remainder of Lot 2, which superceded this permit.
- Jul 1975 Special Permit #640B denied the reduction of the front yard setback along Washington Street for the parking lot.
- Jan 1974 Special Permit #640A approved the reduction of the front yard setback from 20' to 0' along 18<sup>th</sup> Street for the parking lot.

- Oct 1973      Special Permit #640 approved the use of Lot 1, part of Lot 2, and 20' of vacated 18<sup>th</sup> Street right-of-way, all zoned residential, as off-street parking for the adjacent business. Planning Staff recommended conditional approval.
- Sep 1972      Change of Zone #1238 approved changing the zoning on nearby property from D Multiple Dwelling to I Commercial for the enlargement of an existing grocery store and parking lot. City Council removed the parcel containing the parking from this application, stating a special permit was more appropriate than rezoning.
- Nov 1961      Special Permit #220 approved the use of Lot 2, a residential lot, as off-street parking for the adjacent business.
- Sep 1956      Special Permit #100 approved the use of Lot 3, a residential lot, for off-street parking for the adjacent business.

### **COMPREHENSIVE PLAN SPECIFICATIONS:**

The Land Use Plan shows this property as Urban Residential. (F 26)

The community continues its commitment to neighborhoods. Neighborhoods remain one of Lincoln's great strengths and their conservation is fundamental to this plan. The health of Lincoln's varied neighborhoods and districts depends upon implementing appropriate and individualized policies. The Comprehensive Plan is the basis for zoning and land development decisions. It guides decisions that will maintain the quality and character of the community's established neighborhoods. (F 15)

***Guiding Principles*** applying to all forms of Commerce Centers include: (F 42)

Commerce Centers should develop as compact clusters or hubs with appropriate site design features to accommodate shared parking, ease of pedestrian movement, minimize impacts on adjacent areas, and possess a unique character.

New or established commercial uses should not encroach upon, or expand into, existing neighborhoods.

The most intensive commercial uses, such as restaurants, car washes, grocery stores, gasoline/convenience stores and drive thru facilities should be located nearer to the major street or roadway and further from the residential area. Citizens of the community have become increasingly concerned about "light pollution" and its effects upon neighborhoods and the environment. Lighting, dumpsters, loading docks and other service areas should be shielded from the residential area.

***Guiding Principles for Existing Commercial Centers*** (F 49)

Maintain and encourage retail establishments and businesses that are convenient to, and serve, neighborhood residents, yet are compatible with, but not intrusive upon residential neighborhoods.

Expansion of existing commercial and industrial uses should not encroach on existing neighborhoods and must be screened from residential areas.

The priority in older areas should be on retaining areas for residential development. Prior to approving the removal of housing in order to provide for additional parking to support existing centers, alternatives such as shared parking, additional on-street parking or the removal of older commercial stores should be explored.

***Guiding Principles for Existing Neighborhoods*** (F 68)

Encourage a mix of compatible land uses in neighborhoods, but similar uses on the same block face. Similar housing types face each other: single-family faces single-family, change to different use at rear of lot.

Commercial parking lots should not intrude into residential areas where residential uses predominate a block face.

More intense commercial uses (gas stations, big box stores, car washes, fast food, etc.) may not be compatible due to impact on nearby housing.

Expansion in existing centers should not encroach, or expand to encroach, on existing neighborhoods, and commercial areas must be screened from residential areas.

**TRAFFIC ANALYSIS:**

The Comprehensive Plan identifies South 17<sup>th</sup> Street as a Minor Arterial both now and in the future. Garfield, Washington, and South 18<sup>th</sup> Streets are identified as local streets. (E 49, F 103)

**Minor Arterials:** This functional class serves trips of moderate length and offers a lower level of mobility than principal arterial. This class interconnects with, and augments principal arterials, distributes traffic to smaller areas, and contains streets that place some emphasis on land access. These are characterized by moderate to heavy traffic volumes. (F 103)

**Local Streets:** These are composed of all lower order facilities that essentially serve as a conduit between abutting properties and higher order streets. Local streets provide the lowest level of mobility and generally exhibit the lowest traffic volumes. (F 105)

**AESTHETIC CONSIDERATIONS:**

The single-family residence that existed on this lot at the time of the previous application has been removed. Existing residences abut this property to the east, and face this property from the other side of the block. The two lots immediately west of this lot are already paved parking areas serving this grocery store. Further west are two multiple-family residences.

Expanding the parking area in this direction, rather than towards South 17<sup>th</sup> Street, results in a further commercial intrusion into a residential neighborhood. However, through extensive landscaping along Garfield Street and screening adjacent to the residence to the east, the impact can be lessened.

**ALTERNATIVE USES:**

The current zoning designation would allow up to 6 dwelling units on this lot, provided parking and open space requirements could be met.

**ANALYSIS:**

1. This is a request for a special permit to expand an existing parking lot to serve an adjacent grocery store.
2. A special permit for a parking lot in an R-6 Residential district may be granted pursuant to LMC §27.63.170(a), provided the following conditions can be met:
  - (1)(A) The premises upon which the parking lot is located shall not be located more than 300' from the boundary of one of the following districts: O-1, B-1, B-3, B-4, H-2, H-3, or I-1 and the following conditions must be met:

This parking lot is located approximately 100' from a B-3 district.

- (i) The parking lot shall not use a local residential street for access, unless access cannot be gained to the proposed parking lot from a non-residential street. If access is proposed from a local residential street, such access must be gained at a location that does not negatively impact adjacent residential zoned property.

The only existing access shown on the proposed plan is from the parking lot to the north. This lot does have an existing residential curb cut onto Garfield Street, although there is no driveway. This curb cut will need to be replaced. The site plan does label a new curb cut onto Garfield Street at the west end of existing parking area, but Applicant has agreed to remove this access.

- (ii) Any adjacent alley serving the parking lot shall be paved.

There are no adjacent alleys serving this parking lot.

- (iii) Any lighting facility shall be oriented to eliminate light trespass on adjacent residentially zoned properties in accordance with adopted design standards.

There are two light poles located within this parking lot that must conform to design standards for parking lot lighting. It is unclear at this time whether they meet design standards or not.

- (B) In addition to the above conditions, the Planning Commission, in passing upon applications for special permits under subparagraph (1), shall also consider the following criteria:

- (i) **There shall be no residential use located between the parking lot and the commercial or industrial establishment.**

The proposed parking lot is separated from the commercial establishment by an existing parking lot.

- (ii) **The parking lot shall not disrupt the continuity of the block face, and the character of the existing residential neighborhood shall be preserved.**

There is an existing parking lot facing Garfield Street immediately to the west. The proposed parking lot will expand this existing lot, and a single-family residence has already been removed to facilitate this permit. Garfield Street is otherwise characterized by residential uses along both sides. However, this grocery has been a part of this neighborhood for many years, and is part of the character of the area. This use also provides an edge to the neighborhood and an anchor to the other commercial uses along South 17<sup>th</sup> Street.

- (iii) **The parking lot shall be allowed only if it can function as a transitional use while protecting the adjacent residential use.**

This parking lot itself is not a transitional use in the sense that it does expand a commercial use. However, it does increase the distance along Garfield Street between the commercial building and the next residence to the east. In addition, since this is a special permit, the required setback along the east property line and the frontage along Garfield Street provide opportunities for additional landscaping.

- (iv) **The parking lot shall abut a commercial or industrial zoning district.**

This parking lot does not abut a commercial or industrial zoning district.

**An adjustment to these criteria may be granted by the Planning Commission upon a determination that there is sufficient cause for such an adjustment and that there will be no significant impact on adjacent residential uses.**

This proposed parking lot can meet 3 out of 4 of the additional criteria if conditions of approval are required.

3. The first few parking lot permits approved to serve this commercial use were located against the rear yards of adjacent residential uses, which is the more appropriate location to change uses. These permits were approved with conditions based upon increased screening, landscaping, and proper lighting.

Special Permit #1583 represented the first parking lot intrusion through a residential block to a new street frontage. Although finally approved, Planning staff recommended

denial due to the adverse impacts on residential character created by expanding commercial uses into residential areas. However, the Applicant was agreeable to increased landscaping and no access to Garfield Street.

4. Special Permit #1583A failed to gain approval at any level. Significantly, however, the residence that occupied this lot at the time has been removed, and Applicant has remodeled the grocery store.
5. Applicant's letter states "the subject property is incompatible with other land uses within the same zoning district," and "the lot will function as a transitional use while still protecting the use and character of the adjacent residential properties."

If this vacant lot is incompatible, it is due to Applicant's removal of the residence; a more compatible use would be another residence. However, this proposal can be revised to be more compatible than shown. Committing the side and front yards of this lot to an increased amount of landscaping would provide a more appropriate and effective buffer between residential and commercial uses. Screening along Garfield Street should provide 100% vegetative cover between ground level and 4' high, for the entire length of Applicant's property. Screening to the east should provide 90% coverage from ground level to 10' high; in addition to a 6' tall privacy fence, landscaping should provide taller screening to block light trespass.

6. Applicant also states this property was part of their "strategic plan to be a final extension of the special permit 1583 approved by the City Council in 1985." At the time the previous permit was denied, the neighbors and City staff wanted to work with Applicant to develop their long term plans for their development. Since then, the store has been remodeled, and this parking lot expansion is represented as the final plan element.
7. Applicant has not identified a need for additional parking, nor was a need identified with the previous application. Residents of the Near South Neighborhood pointed to this lack of need as a reason to deny Special Permit #1583A. Applicant currently provides 110 parking spaces, with 131 shown with this permit. The standard B-3 requirements for a store this size would be approximately 60 spaces. It is not uncommon for this type of use to provide parking in excess of the minimum requirement.
8. The Design Standards for parking lots appear to be met with this application, although the issue of lighting design remains. The relevant design standards will be reviewed at the time of building permits.

9. The proposed site plan needs to be revised in several ways: the north arrow is incorrect, the lot to be converted to parking is 50' wide but shown as 53' wide, the relocated fence to the east appears to be on property not owned by Applicant, and the required side yard setback for parking is not provided.
10. The various existing parking lot special permits serving this use that are still located within residential zoning should be combined into this one permit. The site plan should be revised accordingly. Approval of this permit will void and supercede previous permits.
11. Public Works comments:
  - 11.1 The City Engineer's Office of the Department of Public Works and Utilities has reviewed the Russ's B & R IGA Parking Lot, Special Permit #1583B located at 17th and Garfield Streets. Public Works has no objection to the proposed concept, however recommends denial until a grading plan has been approved to show parking lot drainage including that portion of the vacated alley from 18th Street that has not been reconstructed since the 1986 project.
  - 11.2 A current storm sewer project beginning in October 2005 will enhance the system in 17th Street. That system can be tapped to relieve the storm water issues in the existing parking areas and possibly this proposed project, provided a timely grading plan is submitted.

Should the Planning Commission choose to recommend approval of this application, the following conditions should be applied.

**CONDITIONS:**

Site Specific:

1. Before receiving building permits:
  - 1.1 Revise the site plan to:
    - 1.1.1 Show the zoning district boundaries in the area.
    - 1.1.2 Add a note indicating all parking lot lighting will be oriented to eliminate light trespass on adjacent residentially zoned properties in accordance with City of Lincoln Design Standards.

- 1.1.3 Add a note indicating screening along Garfield Street will provide 100% coverage from ground level to 4' high, and screening for the residence adjacent to the east will provide 90% from ground level to 10' high.
  - 1.1.4 Identify the boundaries of this lot.
  - 1.1.5 Remove any construction or improvements shown on property not owned by Applicant.
  - 1.1.6 Remove the access to Garfield Street.
  - 1.1.7 Show the required 7' side yard setback for parking lots in R-6.
  - 1.1.8 Correct the orientation of the north arrow.
  - 1.1.9 Show the areas under existing special permits for parking lots serving this use within the boundaries of this permit, as well as all waivers granted under those permits.
  - 1.1.10 Provide a grading plan to the satisfaction of Public Works.
  - 1.1.11 Provide a landscape plan.
  - 1.1.12 Provide a bond in an amount to be determined by The Parks and Recreation Department to guarantee the installation of the landscaping within two (2) years following approval of this permit.
  - 1.1.13 Provide a bond in an amount to be determined by the Public Works and Utilities Department to guarantee the reconstruction of the curb and gutter in order to remove the curb cut onto Garfield Street within two (2) years following approval of this permit.
2. This approval permits the use of Lots 1, 2, the east 100' of Lot 6, the east 100' of the vacated east/west alley adjacent thereto and the vacated west 20' of 18<sup>th</sup> Street adjacent to Lots 1 and 6, all in Block 3, A. Hurlbuts Subdivision, and Lots 8, 9, and 10, W. W. Holmes Subdivision, as a parking lot.

General:

- 3.1 The permittee shall have submitted an acceptable, revised final plan.
- 3.2 The construction plans shall comply with the approved plans.

STANDARD CONDITIONS:

4. The following conditions are applicable to all requests:
  - 4.1 Before occupying the parking lot all development and construction shall have been completed in compliance with the approved plans.
  - 4.2 All privately-owned improvements shall be permanently maintained by the owner.
  - 4.3 The site plan accompanying this permit shall be the basis for all interpretations of setbacks, yards, locations of buildings, location of parking and circulation elements, and similar matters.
  - 4.4 This resolution's terms, conditions, and requirements bind and obligate the permittee, its successors and assigns.
  - 4.5 The applicant shall sign and return the letter of acceptance to the City Clerk within 30 days following the approval of the special permit, provided, however, said 30-day period may be extended up to six months by administrative amendment. The clerk shall file a copy of the resolution approving the special permit and the letter of acceptance with the Register of Deeds, filling fees therefor to be paid in advance by the applicant.
5. The site plan as approved with this resolution voids and supersedes all previously approved site plans. Special Permits #100, 640, 1052, 1052A, 1052B, and 1583 are hereby voided and superceded by this special permit, however, all waivers granted therein remain in full force and effect.

Prepared by:

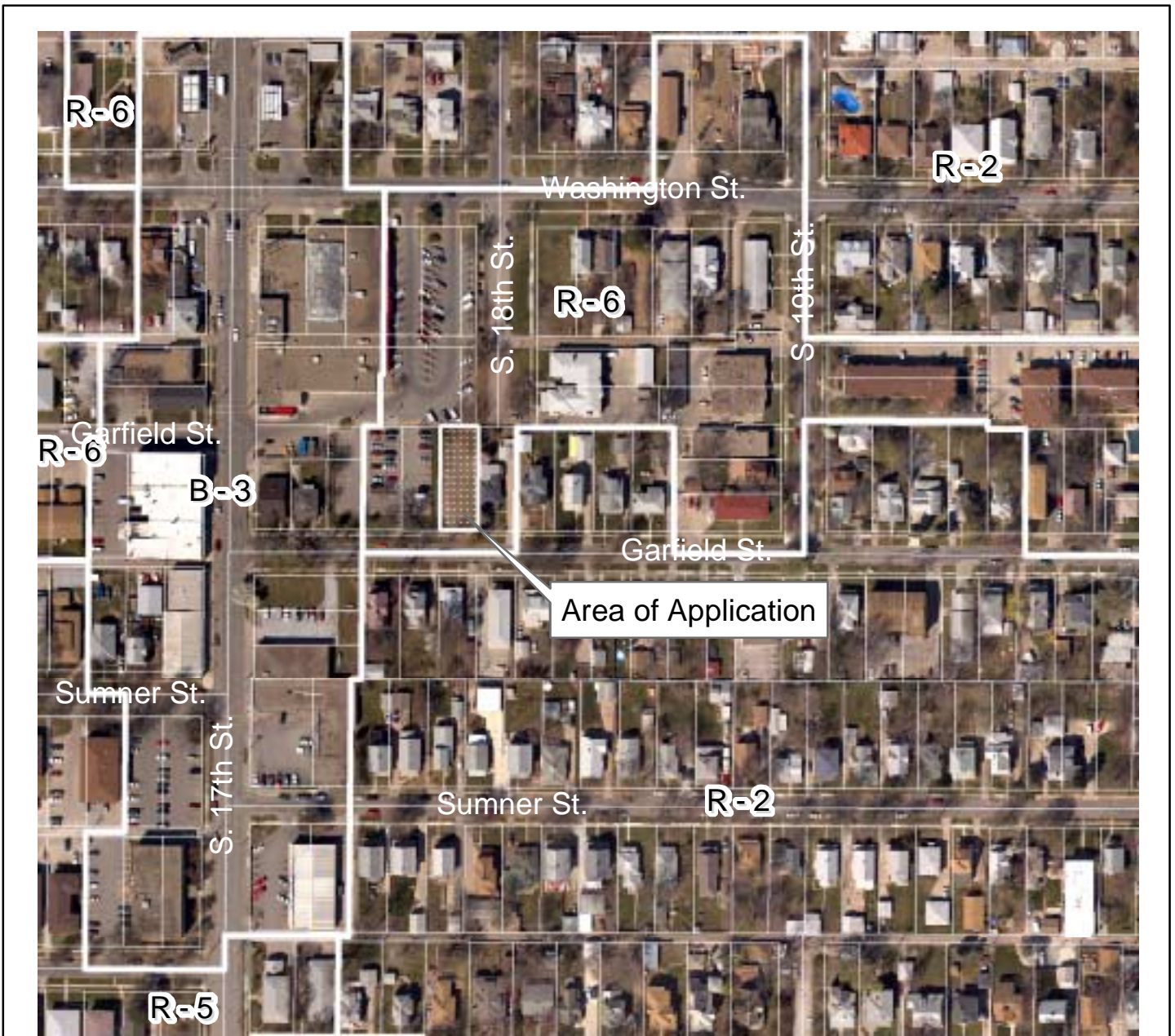
Greg Czaplewski, 441.7620, gczaplewski@ci.lincoln.ne.us  
Planner

**Date:** October 30, 2005

**Applicant:** Russell W. Raybould  
2020 Harrison Street  
Lincoln, NE 68502  
475.8230

**Owner:** Raybould Partners, Ltd.  
PO Box 5824  
Lincoln, NE 68505  
464.6297

**Contact:** Keating, O'Gara, Davis, & Nedved, P.C.  
Paul J. Peter  
530 South 13<sup>th</sup> Street, Suite 100  
Lincoln, NE 68508  
475.8230



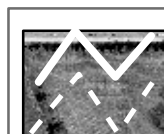
## Special Permit #1583B S. 17th & Garfield St.

2005 Aerial

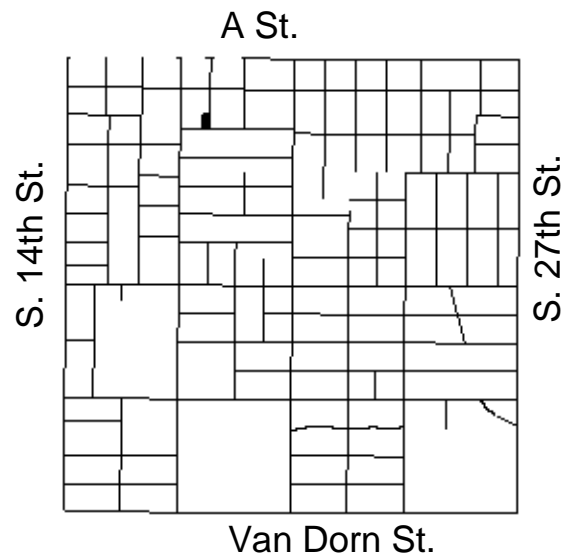
### Zoning:

- R-1 to R-8 Residential District
- AG Agricultural District
- AGR Agricultural Residential District
- R-C Residential Conservation District
- O-1 Office District
- O-2 Suburban Office District
- O-3 Office Park District
- R-T Residential Transition District
- B-1 Local Business District
- B-2 Planned Neighborhood Business District
- B-3 Commercial District
- B-4 Lincoln Center Business District
- B-5 Planned Regional Business District
- H-1 Interstate Commercial District
- H-2 Highway Business District
- H-3 Highway Commercial District
- H-4 General Commercial District
- I-1 Industrial District
- I-2 Industrial Park District
- I-3 Employment Center District
- P Public Use District

One Square Mile  
Sec. 36 T10N R6E



Zoning Jurisdiction Lines  
City Limit Jurisdiction





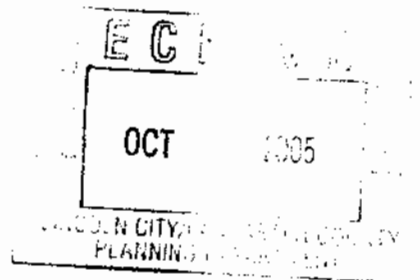
### **Purpose Statement**

The subject property is located directly south and east of current properties owned by the Applicant that are used for parking lot purposes. In 1995, the Applicant secured special permit #1583 for lots 9 and 10, which are located directly to the west of the subject property. That special permit was obtained to increase parking opportunities for patrons of the grocery store known as Russ's Market, located on 17<sup>th</sup> and Washington Street and contiguously located to the parking lot properties. At the time special permit 1583 was obtained, Applicant did not own the subject property.

The subject property was purchased by Applicant in December of 2002 from the estate of Ernestine Anna Younker. That transaction was a part of an option to purchase the Applicant had secured from Mrs. Younker in 1987. The intention was to allow Mrs. Younker to live in the house as long as she wanted, with the Applicant then acquiring the property from Mrs. Younker when she was ready to sell it, or otherwise following her death.

The subject property was part of the Applicant's strategic plan to be a final extension of the special permit number 1583 approved by the City Council in 1995. The house on the subject property has now been razed, and Applicant is seeking to complete the final chapter of the parking lot expansion with this single lot.

As currently situated, the subject property is incompatible with other land uses within the same zoning district. Applicant believes the proposed parking lot use, pursuant to the special permit, would be appropriately and acceptably used in such a manner as to protect abutting land uses as well as the character of the area. The parking lot will not disrupt the continuity of the block base, and the character of the existing residential neighborhood will be preserved. The lot will function as a transitional use while still protecting the use and character of the adjacent residential properties.





"Paul J. Peter"  
<pjpeter@keatinglaw.com>  
10/24/2005 12:23 PM

To "Greg Czaplewski (gczaplewski@lincoln.ne.gov)"  
<gczaplewski@lincoln.ne.gov>  
cc "Jane Raybould (jane@brstores.com)"  
<jane@brstores.com>

bcc

Subject 1744 Garfield special permit application

Greg,

Following up on our telephone conversation of today's date, please allow this e-mail to serve as our request to amend the application in order to remove the entrance/exit off Garfield Street as shown on the site plan. The entrance/exit was not technically on the lot which is the subject of this application (Lot 8), but was included on a part of the parking lot which is west of the subject property which has already been approved (and has been used) for parking by a prior special permit. In any event, I can represent to you that the grocery store does not intend to have an entrance/exit from Garfield into the south end of the parking lot.

With this concession, we have been advised by the neighborhood association that it will not oppose the application. The association specifically acknowledged the long, positive history that Russ's Market and the association have experienced working together, as demonstrated by the recent major capital improvements made by my client to this store.

Please contact me if you need anything else.

Sincerely,  
/s/ Paul J. Peter

Paul J. Peter  
Keating, O'Gara, Nedved & Peter, PC, LLO  
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KEATING, O'GARA, DAVIS & NEDVED, P.C.

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**PURPOSE STATEMENT FOR  
SPECIAL PERMIT #1583**

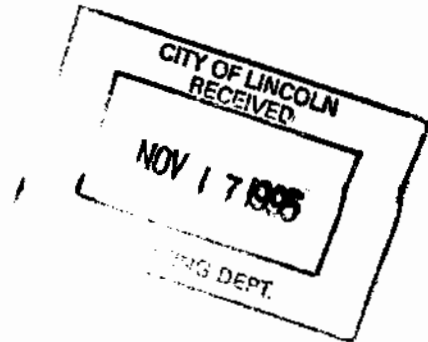
530 SOUTH 13TH STREET, SUITE A  
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November 16, 1995

**HAND DELIVERY**

Mr. Richard Bollerup  
Lincoln City - Lancaster County Planning Commission  
555 South 10th Street  
Lincoln, NE 68508

RE: Special Permit #1583  
1736 & 1740 Garfield Street  
Paul J. Peter, Applicant



Dear Commissioner Bollerup:

I wanted to write to you in order to follow-up and respond to your comments and concerns regarding our special permit application.

I have had an opportunity to review the prior history and other relevant materials available through the Planning Department and Clerk's office regarding the earlier parking special permits. While I understand you are having it independently reviewed by Jennifer Dam, I wanted to share my thoughts after reviewing that material.

As we previously indicated, the grocery store was originally purchased by Russell W. Raybould and his partner in 1962. It appears that the City actually approved special permits for the store's parking lot going back to the 1950s. In the early 1970s, the City approved a revised special permit for parking, a waiver of front yardage on 18th Street and the vacation of a portion of South 18th Street. This was all accomplished in connection with a change of zone request as it pertained to the existing store.

In 1984, Mr. Raybould requested a special permit to expand and allow for additional parking. At that time, it appears that the entire parking lot area, including that within the B-3 zoning area, was revised to conform with current parking regulations. One of the principal changes was the elimination of any access to the parking lot from 18th Street.

In 1986, an application for a special permit was submitted to redesign the layout of the existing parking lot. This request was done in conjunction with remodeling and expansion of the current store which was located totally within the B-3 commercial district. It appears at that time you personally raised concerns about the changes proposed in the application and requested additional conditions to the staff report recommendations. Those conditions included appropriate landscaping, lighting, and the approval of a bond covering the estimated costs of the construction of the required fence and landscaping.

Mr. Richard Bollerup  
November 16, 1995  
Page 2

The minutes of the Planning Staff discussion (pertaining to the 1986 application) are very instructive on this issue. On page 2 of that report, it is indicated that the neighborhood residential environment *on the east side of 18th Street should be preserved and maintained*. It was also noted that a definite separation between retail and residential uses was necessary to attain this objective. Nothing within the materials suggested a concern about expansion to the south, nor were there any representations that the applicant would refrain from seeking additional parking to the south.

The current request for special permit does not negatively or adversely affect the objective addressed in 1986. As I indicated at the time of the hearing before the Commission, we believe this application is a logical extension to the original special permit issued in the 1950s by developing a continuous linear parking lot further to the south. Moreover, the proposal does not infringe upon the original objectives regarding the need to preserve the residential nature of the neighborhood on the east side of 18th Street.

B & R Stores and the Raybould family have worked diligently with its neighbors to submit a plan that is workable for both the company and the neighborhood. I believe the fact that the neighborhood association supports the request in its current form confirms the mutual goal of both the company and its neighbors on this topic. Moreover, after reviewing the history of these and the contiguously-located properties, we are comfortable that the application does not violate the spirit nor the letter of the earlier special permits and the reasons for which they were approved.

As we stated previously, we are willing to accept the additional qualifications contained in the Planning Department's Revised Staff Report of November 8, 1995. We would therefore respectfully request that the Planning Commission approve this Application.

If you should have any questions with regard to this matter or otherwise wish to discuss it with me, please do not hesitate to give me a call.

Very truly yours,



Paul J. Peter  
For the Firm

PJP:nt  
PJPL74

cc: Robert Stephens  
Bruce Bailey  
Ann Bleed  
Matthew J. Wilson  
Russell W. Raybould

Barbara Hopkins  
Russ Bayer  
Bernie Heier  
Lovie Magruder  
Jennifer Dam